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CONSUMER LAW FIRM P.C.

August 1, 2025

Via ECF

Hon. Sharon A. King
Mitchell H. Cohen Building &
U.S. Courthouse
4th & Cooper Streets
Court Room 3B
Camden, New Jersey 08101

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Re: **Rogers v. National Tenant Network, Inc., et al.; No. 25-cv-00585-KMW-SAK
Adjournment of Expert Discovery and Class Certification Motion Deadlines**

Dear Judge King:

My firm represents Plaintiff Ikea Rogers in connection with the above-referenced matter, and I write on behalf of Plaintiff and Defendant LCIJ, Inc. to request that the Court adjourn the current deadlines for expert discovery and Plaintiff's motion for class certification, currently set for August 1, 2025, August 29, 2025, and September 24, 2025, respectively. ECF 25 (March 25, 2025 Scheduling Order).

As discussed during the July 24, 2025 status conference with Your Honor, Plaintiff and LCIJ are in the process of exchanging fact discovery and discussing the possibility of a resolution of the claims as to LCIJ. In order to permit them to complete this process, and to permit complete further proceedings as appropriate with respect to the claims against defaulted Defendant National Tenant Network, Inc., Plaintiff and LCIJ have conferred and agree that adjourning the deadlines on the calendar between now and the next status conference before Your Honor on September 25, 2025 will best serve the interests of judicial economy. Plaintiff and LCIJ jointly propose to provide a status update to the Court by September 22, 2025 with a proposal for further proceedings, including resetting deadlines for expert discovery and class certification briefing if appropriate.

Therefore, Plaintiff and LCIJ jointly and respectfully request that the August 1, 2025 deadline for affirmative expert reports, the August 29, 2025 for rebuttal expert reports, and the September 24, 2025 deadline for Plaintiff's motion for class certification be adjourned. If the Court has any questions, we stand ready to respond.

Respectfully,



Lauren KW Brennan